## IN THE UNITED STATES ARMY FIRST JUDICIAL CIRCUIT

UNITED STATES	)	
	)	DEFENSE ADDITIONAL
v	)	REQUESTED WITNESSES:
	)	ARTICLE 13 MOTION
MANNING, Bradley E., PFC	<u> </u>	
U.S. Army, (b) (6)	)	
Headquarters and Headquarters Company, U.S.	)	
Army Garrison, Joint Base Myer-Henderson Hall,	)	DATED: 26 September 2012
Fort Myer, VA 22211	)	

- 1. On behalf of PFC Bradley E. Manning, his civilian counsel, David E. Coombs requests the attendance of the following additional witnesses for purposes of his Article 13 motion:
  - a) Col. Thomas V. Johnson, (b)(6) Col. Johnson is the former Chief Public Affairs Officer for Marine Corps Combat Development Command and Marine Corps Base Quantico. Col. Johnson will testify about how he assisted the command in addressing media questions and inquiries concerning the treatment of PFC Manning. He was one of the individuals that assisted the command in deflecting criticism of Quantico's treatment of PFC Manning. He also advocated, on behalf of the command, the justifications for why PFC Manning was being held in Maximum Custody and Prevention of Injury Status. Col. Johnson will testify that he provided frequent media updates to LtGen. Flynn and the command concerning PFC Manning. He will also testify about how he provided PAO guidance to the command in order to be portrayed in a more positive light in the media. Finally, he will testify that he ran media questions concerning PFC Manning by LtGen. Flynn and others of the command and staff prior to submitting his responses to the media.
  - b) Capt. Brian S. Villiard, (b)(6) Capt. Villiard is a former Public Affairs Officer for Marine Corps Combat Development Command and Marine Corps Base Quantico. He will testify concerning his role as a PAO representative in explaining the custody status of PFC Manning. Specifically, he will testify concerning the commands' requirement for PFC Manning to surrender his clothing at night, and the statements that Capt. Villiard gave to the media concerning this events on 2 March 2011.
- 2. The Defense reserves the right to supplement this witness list should it be necessary to do so based upon any additional discovery being provided by the Government.

Respectfully submitted,

Digitally signed by CHONBSOMMEDIA/NRO.1152371516 ERIC-US. 6-US. Government on DOO. 00-PM. 00-USA. CA-COOMES DAMDEDWAPD 1152379510 DOOR 2012-08-06-100-101-06-101

DAVID EDWARD COOMBS Civilian Defense Counsel